

1 Honorable Marsha J. Pechman
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8 **UNITED STATES DISTRICT COURT**
9 **WESTERN DISTRICT OF WASHINGTON**

10 HUONG HOANG, an individual,

NO. 11-cv-01709-MJP

11 Plaintiff,

12 vs.

13 AMAZON.COM, INC., a Delaware
14 corporation, and IMDB.COM, INC., a
15 Delaware corporation,

16 Defendants.

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18 **DECLARATION OF KEITH SCULLY**
19 **IN SUPPORT OF MOTION FOR**
20 **PARTIAL SUMMARY JUDGMENT**

21 I, Keith Scully, do declare and attest as follows:

22 1. I am over the age of eighteen (18) years of age, counsel of record for
23 Plaintiff Huong Hoang, and competent to testify to the matters stated herein.

24 2. IMDb's continued practice of posting actors' ages has caused actors and
25 members of the industry to join together to complain about IMDb's policies. Actors have
26 gone so far as to petition this Court for redress, even though they are not involved in the
litigation. Attached as **Exhibit A** is a true and correct copy of a letter this firm received
from the Court attaching emails from third parties discussing the impact of IMDb's
disclosure of ages.

27 3. Attached as **Exhibit B** is a true and correct copy of excerpts from
28 IMDb.com's Second Supplemental Answers and Objections to Plaintiff Huong Hoang's

1 First Set of Interrogatories to Defendant IMDb.com, Inc.

2 4. Attached as **Exhibit C** is a true and correct copy of excerpts from the
3 deposition transcript of Huong Hoang taken on July 26, 2012. Portions of this document
4 are filed separately under seal.

5 5. Attached as **Exhibit D** is a true and correct copy of excerpts from the
6 deposition transcript of Huong Hoang taken on August 7, 2012.

7 6. Attached as **Exhibit E** is a true and correct copy of excerpts from the
8 deposition transcript of Joe Kolkowitz taken on August 7, 2012.

9 7. Attached as **Exhibit F** is a true and correct copy of excerpts from the
10 deposition transcript of Giancarlo Cairella taken on August 1, 2012, and exhibits
11 discussed therein. Portions of this document are filed separately under seal.

12 8. Attached as **Exhibit G** is a true and correct copy of excerpts from the
13 deposition transcript of Giancarlo Cairella as a 30(b)(6) representative taken on August 2,
14 2012, and exhibits discussed therein. Portions of this document are filed separately under
15 seal.

16 9. Attached as **Exhibit H** is a true and correct copy of excerpts from the
17 deposition transcript of Adrian Garver taken on August 1, 2012.

18 10. Attached as **Exhibit I** is a true and correct copy of excerpts from the
19 deposition transcript of Adrian Garver as a 30(b)(6) representative taken on August 2,
20 2012.

21 11. Attached as **Exhibit J** is a true and correct copy of excerpts from the
22 deposition transcript of Thomas Whitcomb as a 30(b)(6) representative taken on August
23 3, 2012.

24 I certify and declare under the penalty of perjury under the laws of the United
25 States that to my knowledge the foregoing is true and correct.
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1 Dated this 10th day of December, 2012 at Seattle, Washington.
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Keith Scully